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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

WILLIAM CLARK,

Plaintiff,

v.

LARRY LIDGETT, et al.,

Defendants.

FILED
HARRISBURG, PA

APR 30 2002

Civil No. 01-0764

MARY E. ANDREA, CLERK
Per MB Deputy Clerk

(Judge William W. Caldwell)

**SUPPORTING DOCUMENT TO THE CORRECTIONS
DEFENDANTS' REPLY TO PLAINTIFF'S BRIEF IN
OPPOSITION TO THEIR MOTION FOR A PROTECTIVE ORDER**

Unsworn Declaration of Jeffrey A. Rackovan Exhibit A

Respectfully submitted,
Office of General Counsel

BY:

John J. Talaber

Assistant Counsel

Pa. Department of Corrections

55 Utley Drive

Camp Hill, PA 17011

(717) 731-0444

Attorney Id. No. 83279

Dated: April 30, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

WILLIAM CLARK,

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Civil Action No. 01-CV-0764

(Judge William W. Caldwell)

UNSWORN DECLARATION OF JEFFREY A. RACKOVAN

I, Jeffrey A. Rackovan, hereby declare under penalty of perjury that the following statements are true and correct based upon my personal knowledge and belief:

1. I am presently employed by the Commonwealth of Pennsylvania, Department of Corrections as the Superintendent's Assistant at the State Correctional Institution at Rockview ("SCI-Rockview"). I have held this position since November 1999.
2. As a Superintendent's Assistant I am responsible for the coordination of litigation within a correctional institution.
3. I am familiar with the Plaintiff, William Clark, who is currently serving a 5 year to 15 year sentence for Rape.

4. On April 3, 2002 and April 9, 2002, I received documents from the Department's Office of Chief Counsel in response to Plaintiff's Request for Production of Documents. I was told Plaintiff should submit a request slip to me to arrange a time for him to inspect the documents.
5. On April 18, 2002, I met with Plaintiff in a conference room to inspect the documents. I explained to him to make two piles, one for documents he wanted copies of and the other for documents he did not want copies of.
6. Plaintiff was told he may obtain copies of these documents at his expense and, that charges for the photocopies would be in accordance with Department of Corrections Policy DC-ADM 003 and its Procedure Manual.
7. Upon review of the documents, Plaintiff stated there were some documents missing from his medical records from the early 1990's while at SCI-Graterford. I told him he would have to work that out with the attorneys.
8. On April 25, 2002, I went to Plaintiff's housing unit to deliver his copies of the documents to him and have him sign a cash slip for \$152.04. Plaintiff refused to sign the cash slip stating he would be contacting Attorney John Talaber, to complain about how unfair this was, and how it's all a scheme to prohibit inmates from presenting their cases.

Executed this 25th
day of April 2002.

Jeffrey A. Rackovan
Jeffrey A. Rackovan
Superintendent's Assistant
SCI-Rockview

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PROOF OF SERVICE

The undersigned hereby certifies that the Supporting Document to the Corrections Defendants' Reply Brief to Plaintiff's Brief in Opposition to Their Motion for a Motion Protective Order was served upon the person(s) in the manner indicated below.

Service by first-class mail
addressed as follows:

William Clark, AY-5585
SCI-Rockview
Box A
Bellefonte, PA 16823

James D. Young, Esquire
Lavery, Faherty, Young & Patterson, PC
225 Market Street, Suite 304
P.O. Box 1245
Harrisburg, PA 17108-1245

Marilyn Jones
Marilyn Jones
Clerk Typist II

PA Department of Corrections
55 Utlely Drive
Camp Hill, PA 17011
(717) 731-0444

Dated: April 30, 2002